

14mj360(4)JSM

STATE OF MINNESOTA)
)
COUNTY OF HENNEPIN) ss. AFFIDAVIT OF TIMOTHY GREGG

I, Timothy Gregg, being first duly sworn, hereby depose and state as follows:

1. I am a Special Agent with the Department of Homeland Security (DHS), Homeland Security Investigations (HSI) assigned to the Special Agent in Charge (SAC), St. Paul, Minnesota office and have been so employed since August 2008. Prior to my employment with HSI, I was employed as a Customs and Border Protection Officer for six years and as a Security Policeman with the U.S. Air Force for eight years. I was duly appointed according to law at the time of the events herein and was acting in my official capacity.

2. This affidavit is based on my knowledge and information that was obtained by other agents involved in the investigation. This affidavit does not contain all the facts and circumstances pertaining to this investigation.

3. The testimony of Baldomero LOPEZ LOPEZ (hereafter LOPEZ LOPEZ) is material to a criminal proceeding filed under seal in the United States District Court, District of Minnesota, entitled In the Matter of the Search of Curry N Noodles, A Restaurant Located at 802 Mainstreet in Hopkins, Minnesota, Case Number 14-mj-360 (JSM).

4. LOPEZ LOPEZ is a native and citizen of Guatemala who is illegally or unlawfully present in the United States. LOPEZ LOPEZ illegally entered into the United States on September 28, 2006.

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U.S. DISTRICT COURT ST. PAUL


5. On May 19, 2014, LOPEZ LOPEZ was encountered in Hopkins, Minnesota, as an employee unauthorized to work at Curry N Noodles restaurant.

6. LOPEZ LOPEZ was interviewed by HSI agents. During the interview, LOPEZ LOPEZ provided statements that are material to the government in that he identified information material to possible criminal charges against the current and former owners of Curry N Noodles, including Prem GOLLAPALLI, Lalitha EDPUGANTI, and Sreeram POTHULA, of unlawful hiring, bringing in and harboring certain aliens, and conspiracy.

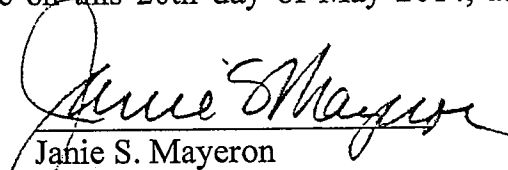
7. LOPEZ LOPEZ has been placed under removal or deportation proceedings that would otherwise likely result in his removal from the United States prior to the completion of any criminal charges resulting from the ongoing investigation into Curry N Noodles.

8. Because of the impending deportation, it would be impractical to secure the presence of LOPEZ LOPEZ by subpoena.

All statements contained in this affidavit are true and correct to the best of my knowledge.


Timothy Gregg, Special Agent
Homeland Security Investigations

Sworn to before me and subscribed in my presence on this 20th day of May 2014, at Minneapolis, Minnesota.


Janie S. Mayeron
United States Magistrate Judge